

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

HUMAN RIGHTS DEFENSE CENTER,

Plaintiff,

vs.

No. 1:24-cv-01091-SMD-KRS

MICHELLE LUJAN GRISHAM,
individually and in her capacity as Governor
of the State of New Mexico; ALISHA
TAFOYA LUCERO, individually and in
her capacity as Cabinet Secretary of the
New Mexico Corrections Department;
MELANIE MARTINEZ, individually and
in her capacity as Deputy Secretary of the
New Mexico Corrections Department;
GARY MACIEL, individually and in his
capacity as Deputy Secretary of the
New Mexico Corrections Department;
BRIAN R. EVANS, individually and in
his capacity as Chief Executive Officer of
The GEO Group, Inc.; WAYNE H. CALABRESE,
individually and in his capacity as President and
Chief Operating Officer of The GEO Group, Inc.;
THE GEO GROUP, INC. d/b/a LEA COUNTY
CORRECTIONAL FACILITY, a corporation;
JOHN AND JANE DOES 1-20, individually and
in their official capacities; and ENTITIES 1-10,

Defendants.

**OPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS LUCERO,
MARTINEZ, AND MACIEL TO RESPOND TO PLAINTIFF'S DISCOVERY
REQUESTS**

COME NOW Defendants Lucero, Martinez, and Maciel (hereinafter "Defendants"), by
and through their counsel of record, CARRILLO LAW FIRM, P.C. (Raul A. Carrillo, Jr.), and
hereby request the Court grant an extension of time for these Defendants to answer the
propounded discovery requests. In support of this Motion Defendants state as follows:

1. On May 22, 2025, Plaintiff served its first set of interrogatories to Defendant Lucero. *See, Certificate of Service [Doc. 61]*
2. NMCD administrates 8 different prison facilities, over 5,000 incarcerated persons per year and comprises a staff of over 2,500 people.
3. Plaintiff requests that the Defendant identify broad groups of people from their 2,500 person staff (and from Defendant GEO Group's staff) who may have had various interactions with their correspondence and publications over an approximately four (4) year period of time. *See, Ex. 1 Plaintiff's Interrogatories to Defendant Lucero generally.*
4. On May 22, 2025, Plaintiff served its First Set of Requests for Production on Defendants Grisham, Lucero, Martinez, and Maciel. *See, Certificate of Service [Doc. 61].*
5. Defendant Grisham has contemporaneously requested a stay of discovery in this matter until the resolution of her pending Motion for Dismissal. *See, Motion to Stay [Doc. 63]*
6. In the same vein as the Interrogatories to Lucero, the Defendant's Request for Production request potentially vast amounts of documentation and communications from across the NMCD prison system. In order to determine if the Defendants have responsive information to the non-objectionable requests the Defendants will need more time to review the large amount of information available.
7. Finally, the Defendants undersigned counsel had longstanding vacation plans to be out of the country beginning Wednesday June 11, 2025 – June 19, 2025. The undersigned provided a Notice of Non-availability to the Court notifying them he would be unavailable from June 1 – 19 on February 18, 2025. *See, Notice of Non-Availability [Doc. 39].*

8. In accordance with D.N.M. LR-Civ. 7.1(a) the Plaintiff's counsel was contacted regarding the relief requested in this motion and opposes the relief requested herein.

WHEREFORE, for the foregoing reasons the Defendants respectfully request that the Court grant an extension of forty-five (45) days for the Defendants to respond to the propounded interrogatories and requests for production, and grant any other relief it deems just and reasonable.

Respectfully submitted,

CARRILLO LAW FIRM, P.C.

/s/ Raul A. Carrillo, Jr.

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*Attorney for Defendants Grisham,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on the 20th of June, 2025, a copy of the foregoing document was sent via the federal CM/ECF filing system to the following:

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Raúl A. Carrillo, Jr.